

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RALPH “TREY” JOHNSON,
STEPHANIE KERKELES,
NICHOLAS LABELLA,
CLAUDIA RUIZ,
JACOB WILLEBEEK-LEMAIR,
ALEXA COOKE,
RHESA FOSTER,
ZACHARY HARRIS,
MATTHEW SCHMIDT,
TAMARA SCHOEN STATMAN,
GINA SNYDER,
ESTEBAN SUAREZ and
LIAM WALSH,
individually and on behalf of all persons
similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, a/k/a the NCAA, and the
following NCAA Division I Member Schools
as representatives of a Defendant Class of all
private and semi-public NCAA Division I
Member Schools:

CORNELL UNIVERSITY,
FORDHAM UNIVERSITY,
LAFAYETTE COLLEGE,
SACRED HEART UNIVERSITY,
VILLANOVA UNIVERSITY,
UNIVERSITY OF OREGON,
TULANE UNIVERSITY,
UNIVERSITY OF NOTRE DAME,
UNIVERSITY OF ARIZONA,
PURDUE UNIVERSITY,
DUKE UNIVERSITY, and
MARIST COLLEGE,

Defendants.

Case No. 2:19-cv-5230 (JP)

**DECLARATION OF JAMES D.
WANDLING IN SUPPORT OF
DEFENDANT, THE ADMINISTRATORS
OF THE TULANE EDUCATIONAL
FUND’S MOTION TO DISMISS
PURSUANT TO
RULES 12(b)(2) AND 12(b)(6)**

EXHIBIT

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**DECLARATION OF JAMES D. WANDLING IN SUPPORT OF TULANE
UNIVERSITY'S MOTION TO DISMISS**

1. My name is James D. Wandling. I am currently the University Controller at Tulane University ("Tulane"). In connection with my role as the University Controller, I oversee the financial operations of Tulane.
2. The foregoing is based upon my personal knowledge and review of the business records of Tulane. I would so testify were I called upon to do so in a court of law, including in connection with *Johnson et al. v. NCAA et al.*, United States District Court for the Eastern District of Pennsylvania, Case No. 2:19-cv-5230 (the "Lawsuit").
3. Between November 6, 2016, three years preceding the filing of the Lawsuit, and the present, Tulane has not been and is not currently registered to do business in Pennsylvania.
4. Between November 6, 2016, three years preceding the filing of the Lawsuit, and the present, Tulane has not owned and does not currently own any real estate in Pennsylvania.
5. Between November 6, 2016, three years preceding the filing of the Lawsuit, and the present, Tulane has not had and does not currently have any campuses in Pennsylvania.

At this time, I have nothing further to say.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the law of the United States of America that the above is true and correct to the best of my knowledge and belief.

Dated: 3/21/2025

By: 
JAMES D. WANDLING